

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

**NOTICE OF MOTION FOR
EXTENSION TO FILE STATEMENT
WITH RESPECT TO SENTENCING
FACTORS AND OBJECTIONS**

Case No. 17-CR-00190

vs.

G. STEVEN PIGEON,

Defendant.

S I R S :

COMES NOW the defendant, G. STEVEN PIGEON, by and through his attorneys, LIPSITZ GREEN SCIME CAMBRIA LLP, PAUL J. CAMBRIA, JR., ESQ., and JUSTIN D. GINTER, ESQ., and upon the annexed affidavit of Justin D. Ginter, Esq., the undersigned moves this court for an order extending the time to file Defendant's statement with respect to sentencing factors and objections scheduled for November 23, 2021 for approximately one (1) week for reasons set forth in the affidavit annexed hereto and made a part hereof together with such other and further relief as to this Court may deem just and proper.

DATED: Buffalo, New York
November 23, 2021

Respectfully submitted,

LIPSITZ GREEN SCIME CAMBRIA LLP
PAUL J. CAMBRIA, JR., ESQ.
JUSTIN D. GINTER, ESQ.
Attorneys for Defendant, G. STEVEN PIGEON
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vs.

G. STEVEN PIGEON,

Defendant.

AFFIDAVIT
Case No. 17-CR-00190

JUSTIN D. GINTER, ESQ., being duly sworn, deposes and says:

- 1) I, along with Paul J. Cambria, Jr., Esq. represent the defendant, G. Steven Pigeon.
- 2) Defendant's statement with respect to sentencing factors and objections are currently due November 23, 2021.
- 3) I respectfully request the Court extend the time to file these documents for approximately one (1) week, without changing any other deadlines on the current sentencing submission Order.
- 4) I respectfully make this request due to my current case schedule, the Thanksgiving holiday, and a personal matter that I can explain to the Court if needed.
- 5) Assistant United States Attorney Paul E. Bonanno was contacted, and the Government does not object to this request.

WHEREFORE, for the reasons set forth above, your deponent respectfully requests and Order extending the time to file Defendant's statement with respect to sentencing factors and objections scheduled for November 23, 2021 for approximately one (1) week without changing any other deadlines on the current sentencing submission Order.

/s/ Justin D. Ginter, Esq.

JUSTIN D. GINTER, ESQ.

Subscribed and sworn to before me this
23rd day of November, 2021.

/s/Kristina Drewery
Commissioner of Deeds
Qualified in Erie County
My Commission Expires December 31, 2022